

WATERSHED DESCRIPTION AND MAPS

The New Haven Estuary (Estuary 6) covers an area of approximately 5,922 acres in southwestern Connecticut. The impaired segment is located in the central portion of Long Island Sound (LIS) in the municipalities of New Haven and West Haven, CT.

The New Haven Estuary includes one segment impaired for commercial shellfish harvesting. This segment was assessed by Connecticut Department of Energy and Environmental Protection (CT DEEP) and included in the CT 2010 303(d) list of impaired waterbodies. Some segments in the estuary are currently unassessed as of the writing of this document. This does not mean there are no potential issues on these segments, but indicates a lack of current data to evaluate the segments as part of the assessment process. An excerpt of the Integrated Water Quality Report is included in Table 1 (CT DEEP, 2010).

Impaired Segments

Segment 1: LIS CB Inner – New Haven Harbor (CT-C1_013-SB) is part of the central portion of LIS extending from the inland saltwater limit to the shoreline. Segment 1 is part of the inner estuary of New Haven Harbor from Sandy Point to the Interstate 95 crossing, and includes the mouth of the Quinnipiac, Mill, and West Rivers in New Haven and West Haven, CT (Figure 1; Table 1).

Impaired Segment Facts

Impaired Segments, Classifications, and Areas (square miles):

<u>Segment 1</u>: LIS CB Inner – New Haven Harbor (*CT-C1 013-SB*); SB; 2.34

Municipalities: New Haven and West

Haven

Designated Use Impairments: Shellfish

MS4 Applicable? Yes

Applicable Season: Recreation Season (May 1 to September 30), Year Round for Shellfishing Uses



This impaired segment of the New Haven Estuary has a water quality classification of SB. Designated uses include commercial shellfish harvesting, recreation, habitat for marine fish and other aquatic life and wildlife, industrial water supply, and navigation. This segment of the estuary is impaired due to elevated bacteria concentrations, affecting the designated use of commercial shellfishing.

Table 1: Impaired segments in the New Haven Estuary from the Connecticut 2010 Integrated Water Quality Report

Waterbody ID	Waterbody Name	Location	Square Miles	Marine Aquatic Life	Recreation	Direct Shellfish	Commercial Shellfish	Fish Consumption
CT-C1_013- SB	LIS CB Inner - New Haven Harbor, New Haven	Central portion of LIS, Inner Estuary, Inner New Haven Harbor from Sandy Point to I95 crossing (mouth of Quinnipiac and Mill Rivers, and mouth of West River), New Haven/West Haven.	2.34	NOT	NOT	////	NOT	FULL
CT-C2_018- SB	LIS CB Shore - New Haven Harbor (West), West Haven	Central portion of LIS from Oyster River Point to Sandy Point area (includes West Haven West Beach, West Haven East Beach, West Shore, Sandy Point), out approximately 1000 ft offshore, West Haven.	0.79	NOT	FULL	////	NOT*	FULL
CT-C3_016	LIS CB Midshore - West Haven	Central portion of LIS, SA water from SA/SB water boundary along outer New Haven Harbor, out to 50 ft contour, West Haven.	6.12	NOT	U	NOT*	////	FULL

Shaded cells indicate impaired segment addressed in this TMDL

FULL = Designated Use Fully Supported

NOT = Designated Use Not Supported

U = Unassessed

/// = Not Applicable to Segment

^{*}Bacteria data through 2011 shows attainment

Figure 1: GIS map featuring general information for the impaired segment in the New Haven Estuary



Shellfish Bed Classifications, Closures, and Lease Locations

The Connecticut Department of Agriculture/Bureau of Aquaculture (CT DA/BA) is responsible for regulating shellfish harvesting (http://www.ct.gov/doag/cwp/view.asp?a=1369&Q=259170). A shellfish growing area is defined by CT DA/BA as any area that supports or could support the growth and/or propagation of molluscan shellstock. Shellfish are defined by CT DA/BA as oysters, clams, mussels, and scallops, either shucked or in the shell, fresh or frozen, whole or in part. All shellfish growing areas are classified by CT DA/BA in accordance with the Interstate Shellfish Sanitation Conference (ISSC) National Shellfish Sanitation Program Model Ordinance (NSSP-MO) and CT General Statutes Chapter 491, §26-192e. These classifications, summarized below, are established to minimize health risks and may restrict the take and use of shellfish from some areas. They are based on fecal coliform bacteria standards as provided in the NSSP-MO (Interstate Shellfish Sanitation Conference, 2007). Any shellfish area, regardless of classification, may be temporarily closed to all activities when a potential public health emergency exists as a result of a storm event, flooding, sewage, chemical, or petroleum discharges, or a hazardous algal bloom.

Shellfish harvesting has been divided into two designated uses as specified in the Connecticut WQS: shellfish harvesting suitable for direct human consumption (Class SA waters), and shellfish harvesting suitable for commercial operations requiring depuration or relay (Class SB waters). The impaired segment in the New Haven Estuary includes Class SB waters.

Shellfish Bed Classifications and Closures in the New Haven Estuary

Shellfish classification areas in the New Haven Estuary are shown in Figure 2. The following classifications for shellfish growing areas are defined by CT DA/BA:

Approved Area: A growing area that is safe for the direct marketing or consumption of shellfish. An area may be classified as "Approved" when a sanitary survey finds that there is no contamination from human or animal fecal matter at levels that present an actual or potential public health hazard, and is not contaminated by pathogenic organisms, poisonous or deleterious substances, or marine biotoxins, and has water quality that meets the bacteriological standards for an Approved growing area.

Conditionally Approved Area: A growing area that, when open, shellfish may be harvested recreationally for consumption, or commercially for market. An area may be classified as "Conditionally Approved" when a sanitary survey finds that these areas can remain open for a reasonable period of time, and that factors impacting the area are known and predictable and do not preclude a reasonable management approach. Bacteriological water quality must correlate with the factors impacting the growing area. Each Conditionally Approved growing area must have a written management plan that is adhered to by all responsible parties.

Restricted-Relay/Depuration: A growing area in which the sanitary survey finds there are levels of fecal pollution, human pathogens, or poisonous or deleterious substances that can be reduced by relaying the shellstock to Approved or Conditionally Approved waters for natural cleansing or depuration. Shellfish from these areas may not be directly harvested for market or consumption.

Conditionally Restricted: A growing area that the sanitary survey finds meets "Restricted" classification when the area is in the open status, and meets the "Prohibited" classification when the area is in the closed status. The management plan must designate whether harvested shellfish are relayed or depurated.

Prohibited: A growing area where there has not been a sanitary survey conducted within the last 12 years must be classified as Prohibited. Any area with a sewage treatment plant outfall or other point source that could impact public health is classified as Prohibited. This classification prohibits the harvest of shellfish except for seed oystering or depletion of the area.

As discussed above and shown in Table 1, Segment 1 does not meet its designated use for shellfish harvesting for commercial human consumption due to bacteria (Table 1). Segment 1 (CT-C1_013-SB) is located in the Prohibited shellfish growing waters of New Haven Harbor (Figure 2).

Shellfish Bed Lease Locations

Shellfish beds in the New Haven Estuary are also classified by their management (Figure 3). CT DA/BA defines these areas as follows:

State and Town Beds: In 1881, a line, referred to as the Commissioner's Line, was established to divide the waters of the State into northern and southern sections. All beds south of this line are State beds and most beds north of this line are town beds. Town beds are leased, owned or managed through the local shellfish commission. However, CT DA/BA still controls all the licensing and regulations for both state and town beds. For example, DA/BA issues licenses and determines when an area will be closed to shellfishing due to a change in water quality. Towns may require additional permits to work in waters under local jurisdiction. Beds north of the line in Westport, Milford, West Haven, and New Haven are exceptions to this as they are fully under State control.

State and Town Natural Beds: Natural beds get their name from the fact that shellfish, especially oyster, naturally inhabited the area. These areas tend to be closer to shore, usually at the mouth of a river. Natural beds have specific regulations concerning their use, including licensing and harvesting methods. They are predominately seed beds that cannot be mechanically harvested. Use of natural beds requires a Relay/Transplant License I or II and/or Seed Oyster Harvesting License from CT DA/BA. Any person assisting in the harvesting of seed oysters must have a Helper's License. These beds cannot be leased or subdivided; they are to remain open to any properly licensed harvester. State natural beds are natural beds south of the Commissioner's Line. Descriptions of these beds can be found in §3295 of the Connecticut General Statutes (CGS), revision of 1918. Not all beds listed in §3295 were mapped, and many natural beds in State waters off Greenwich are managed through leases. Town natural beds were defined by law under §2326 of the CGS of 1888. Each town had the opportunity to map areas to be considered natural beds. The documents, written descriptions, and maps were submitted to the Superior Court with jurisdiction for that town. Several towns did not avail themselves to this opportunity, and some, such as Westport, have changed the delineation of their natural beds in recent court decisions. There are also areas that may have been declared natural beds, but are now leased.

Segment 1 (CT-C1_013-SB) is split between natural beds on the West Haven side of New Haven Harbor and town-managed beds on the New Haven side of New Haven Harbor (Figure 3).

Figure 2: GIS map featuring Shellfish Bed Classifications and Closures for the impaired segment in the New Haven Estuary

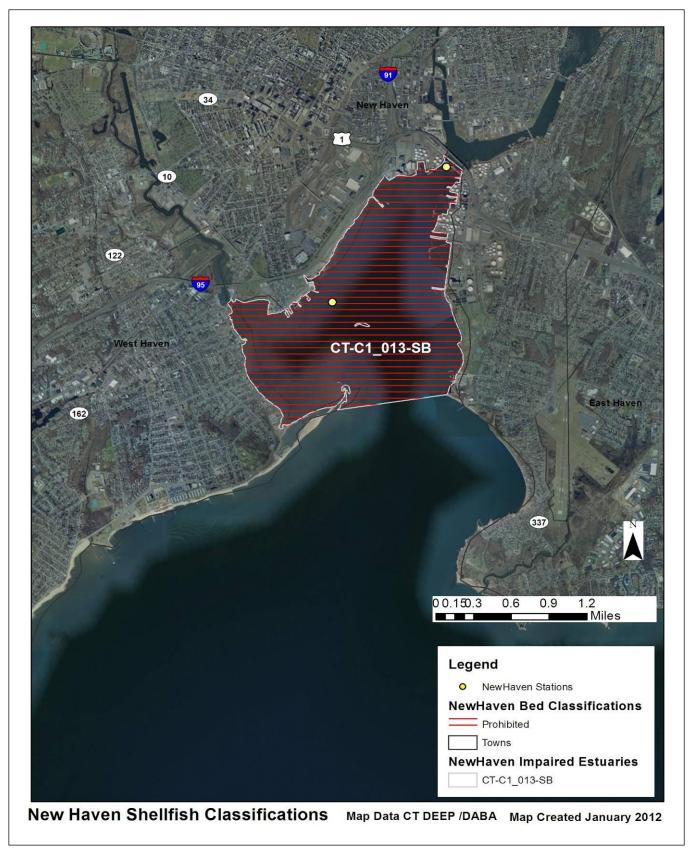
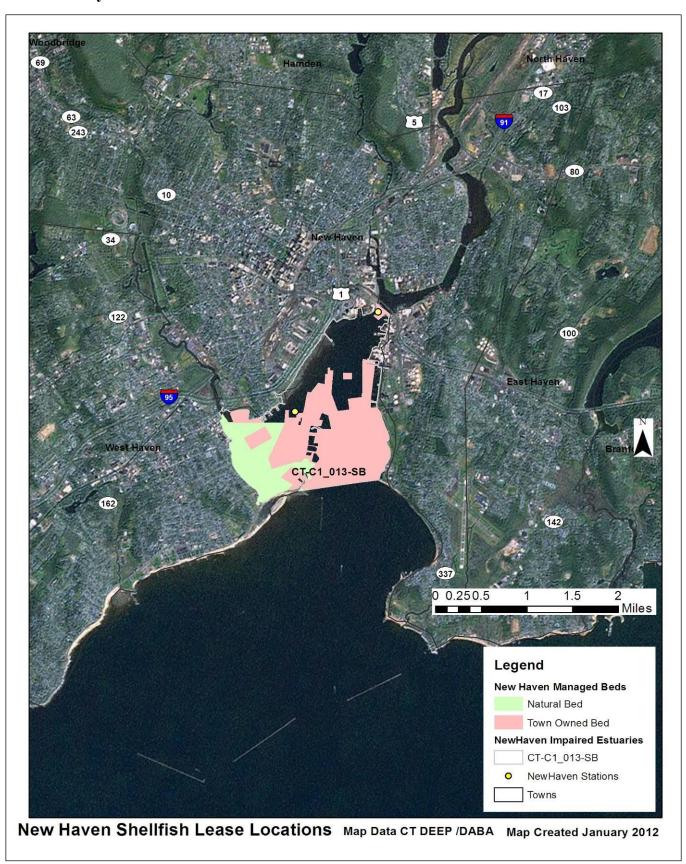


Figure 3: GIS map featuring Shellfish Bed Lease Locations for the impaired segment in the New Haven Estuary



WHY IS A TMDL NEEDED?

For saltwater segments, the indicator bacteria, fecal coliform, is used in the CT Water Quality Standards (WQS) to assess shellfish uses for Class SA and SB waters (CTDEEP, 2011). Enterococcus is the indicator bacteria used to assess recreational uses for Class SA and SB waters. All data are from CT DEEP, USGS, Bureau of Aquaculture, or volunteer monitoring efforts at stations located on the impaired segments.

Segment 1 (CT-C1_013-SB) is a Class SB saltwater waterbody. Designated uses include commercial shellfish harvesting, recreation, habitat for marine fish and other aquatic life and wildlife, industrial water supply, and navigation. Water quality analyses were conducted using data from two sampling locations on Segment 1. The water quality criteria for fecal coliform, along with bacteria sampling results from 2000 - 2005, and 2007 - 2011, are presented in Table 11. This segment of the estuary is impaired due to elevated bacteria concentrations, affecting the designated use of commercial shellfishing. To aid in identifying possible bacteria sources, the geometric mean was also calculated for wet-weather and dryweather sampling days for all stations on Segment 1, where possible (Table 13).

Segment 1 (CT-C1_013-SB): As shown in Table 13, 90% less than values exceeded the WQS for fecal coliform once at Station 093-04.1 in 2009 during the sampling period. Geometric mean values did not exceed the WQS for fecal coliform at any station for any sampling year. Geometric means for data collected during the sampling period were also calculated for each station using wet and dry-weather conditions, resulting in no exceedance of the WQS for fecal coliform.

Due to the elevated bacteria measurements presented in Table 13, this impaired segment did not meet CT's bacteria WQS, was identified as impaired, and was placed on the CT List of Waterbodies Not Meeting Water Quality Standards, also known as the CT 303(d) Impaired Waters List. The Clean Water Act requires that all 303(d) listed waters undergo a TMDL assessment that describes the impairments and identifies the measures needed to restore water quality. The goal is for all waterbodies to comply with State WOS.

Table 2: Sampling station location description for the impaired segment in the New Haven Estuary

Waterbody ID	Station	Station Description	Municipality	Latitude	Longitude
CT-C1_013-SB	093-04.1	N"4" NEAR City Pt.	New Haven	41.2817	-72.9231
CT-C1_013-SB	093-05.0	S. "Q." Bridge	New Haven	41.2980	-72.9057

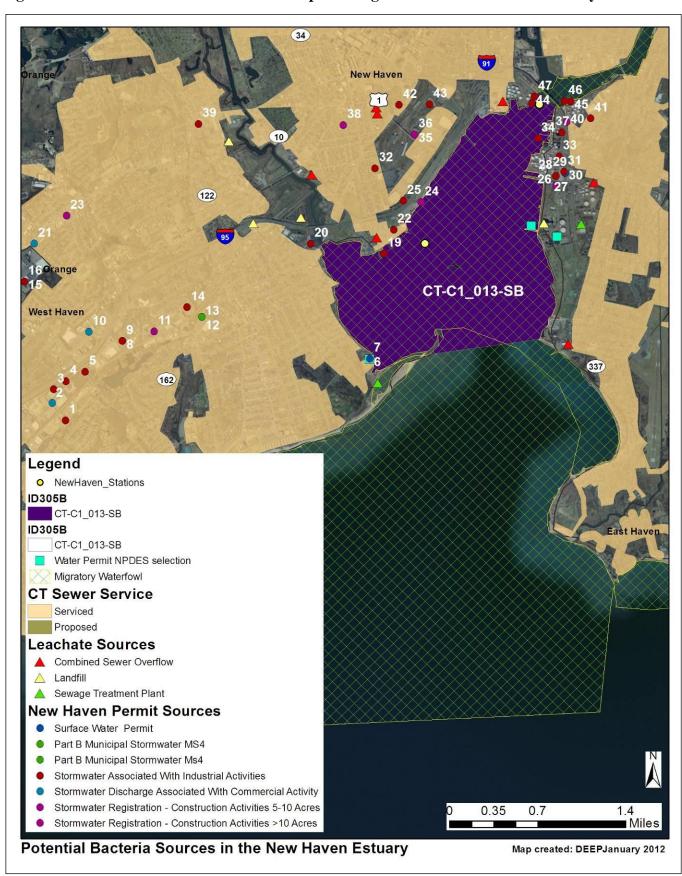
POTENTIAL BACTERIA SOURCES

Potential sources of indicator bacteria in a watershed include point and non-point sources, such as stormwater runoff, agriculture, sanitary sewer overflows (collection system failures), illicit discharges, and inappropriate discharges to the waterbody. Potential sources that have been tentatively identified in the New Haven Estuary are presented in Table 3 and Figure 4. However, the list of potential sources is general in nature and should not be considered comprehensive. There may be other sources not listed here that contribute to the observed water quality impairment in the study segment. Further monitoring and investigation will confirm listed sources and discover additional ones. Some segments in this watershed are currently listed as unassessed by CT DEEP procedures. This does not mean that there are no data or impairments in existence in the segment. There are data from permitted sources for some segments, and CT DEEP recommends that any elevated concentrations found from those permitted sources be addressed through voluntary reduction measures. More detailed evaluation of potential sources is expected to become available as activities are conducted to implement these TMDLs.

Table 3: Potential bacteria sources to the impaired segment in the New Haven Estuary

Segment #	Impaired Segment	Permit Source	Illicit Discharge	CSO/SSO Issue	Failing Septic System	Marinas	Stormwater Runoff	Nuisance Wildlife/Pets	Other
1	LIS CB Inner – New Haven Harbor CT-C1_013-SB	X	X	X	X	X	X	X	X

Figure 4: Potential bacteria sources to the impaired segment in the New Haven Estuary



The potential sources map for the impaired basin was developed after thorough analysis of available data sets. If information is not displayed in the map, then no sources were discovered during the analysis. The following is the list of potential sources that were evaluated: problems with migratory waterfowl, golf course locations, reservoirs, proposed and existing sewer service, cattle farms, poultry farms, permitted sources of bacteria loading (surface water discharge, MS4 permit, industrial stormwater, commercial stormwater, groundwater permits, and construction related stormwater), and leachate and discharge sources (agricultural waste, CSOs, failing septic systems, landfills, large septic tank leach fields, septage lagoons, sewage treatment plants, and water treatment or filter backwash).

Point Sources

Permitted sources within the watershed that could potentially contribute to the bacteria loading are identified in Table 4. This table includes permit types that may or may not be present in the impaired watershed. A list of active permits in municipalities that drain to the New Haven estuary is included in Table 5. Additional investigation and monitoring could reveal the presence of other discharges in the estuary.

Table 4: General categories list of permitted discharges

Permit Code	Permit Description Type	Number in Estuary
CT	Surface Water Discharges	2
GPL	Discharge of Swimming Pool Wastewater	0
GSC	Stormwater Discharge Associated with Commercial Activity	5
GSI	Stormwater Associated with Industrial Activity	31
GSM	Part B Municipal Stormwater MS4	2
GSN	Stormwater Registration – Construction	7
LF	Groundwater Permit (Landfill)	0
UI	Underground Injection	0

Permitted Sources

As shown in Table 5, there are multiple permitted discharges in New Haven that could be contributing bacteria to the impaired segment. These facilities include the East Shore WPCF, DOT New Haven Boulevard Maintenance Facility, New Haven Terminal, Shore Line East Maintenance Facility, West Haven WPCF, West Haven Public Works Garage, and multiple marinas throughout the watershed. According to the 2008 New Haven Estuary Report, there are approximately 6 marinas in the New Haven Estuary. These include the Pequonnock Yacht Club, Inc. and West Cove Marina. There are water quality data available for some of these discharges (Table 6). Although this data cannot be compared to the WQS as there is no single sample shellfish standard for fecal coliform, several samples were high, exceeding 2,000 colonies/100 mL or "too numerous to count" (TNTC), including Williams Energy Ventures (GSI001374), New Haven WPCA (GSI000215), H. Bixon & Sons (GSI000228), New Haven TRF Station (GSI000800), New Haven Terminal (GSI000863), C. Cowles & Co (GSI000925), H. Krevit & Co (GSI001037), New Haven USPS (GSI001066), Tweed New Haven Airport Authority (GSI001113), New Haven Rail Yard (GSI001356), Saint-Gobain Performance Plastics Corp (GSI001379), Sargent Manufacturing (GSI001521), West Cove Marina (GSI001013), and Lakin Tire East (GSI001025). These permitted industrial discharges may be contributing bacteria to the New Haven estuary.

Since the MS4 permits are not targeted to a specific location, but the geographic area of the regulated municipality, there is no one accurate location on the map to display the location of these permits. One dot will be displayed at the geographic center of the municipality as a reference point. Sometimes this location falls outside of the targeted watershed and therefore the MS4 permit will not be displayed in the Potential Sources Map. Using the municipal border as a guideline will show which areas of an affected watershed are covered by an MS4 permit.

Table 5: Permitted facilities in New Haven, CT that may be affecting the New Haven Estuary

Town	Client	Permit ID	Permit Type	Site Name	Address	Map #
New Haven	Greater New Haven WPCA	CT0100366	Surface Water Permit	East Shore WPCF	345 East Shore Parkway	30
New Haven	CT DOT	GSI000043	Stormwater Associated With Industrial Activities	DOT New Haven Boulevard Maintenance Facility	35 Sea Street	22
New Haven	Waterfront Enterprises, Inc.	GSI000656	Stormwater Associated With Industrial Activities	Gateway Terminal	400 Waterfront Street	34
New Haven	New Haven Terminal, Inc.	GSI000863	Stormwater Associated With Industrial Activities	New Haven Terminal, Inc.	100 Waterfront Street	27
New Haven	National Railroad Passenger Corp.	GSI000951	Stormwater Associated With Industrial Activities	Associated With Maintenance		32
New Haven	United States Postal Service	GSI001066	Stormwater Associated With Industrial Activities	United States Postal Service New Haven VMF	50 Brewery Street	43
New Haven	Getty Terminals Corp.	GSI001185	Stormwater Associated With Industrial Activities	Getty Petroleum Marketing, Inc.	85 Forbes Avenue	47
New Haven	Motiva Enterprises Llc	GSI001341	Stormwater Associated With Industrial Activities	Motiva Enterprises, Llc	481 E Shore Parkway	31
New Haven	Metro-North Railroad	GSI001356	Stormwater Associated With Industrial Activities	New Haven Rail Yard	2 Brewery Street	35
New Haven	Magellan Terminals Holdings, Lp	GSI001371	Stormwater Associated With Industrial Activities	Magellan Terminals Holdings, Lp	134 Forbes Avenue	45
New Haven	Magellan Terminals Holdings, Lp	GSI001373	Stormwater Associated With Industrial Activities	Magellan Terminals Holdings, Lp	85 East Street	44
New Haven	Magellan Terminals Holdings, Lp	GSI001375	Stormwater Associated With Industrial Activities	Magellan Terminals Holdings, Lp	280 Waterfront Street	33

Table 5: Permitted facilities in New Haven, CT that may be affecting the New Haven Estuary (continued)

Town	Client	Permit ID	Permit Type	Site Name	Address	Map #
New Haven	Logistec USA, Inc.	GSI001420	Stormwater Associated With Industrial Activities	Logistec USA, Inc.	100 Waterfront Street	28
New Haven	National Railroad Passenger Corp.	GSI001453	Stormwater Associated With Industrial Activities	New Haven Service & Inspection Facility	50 Union Avenue Annex	42
New Haven	Sargent Manufacturing Company	GSI001521	Stormwater Associated With Industrial Activities	Sargent Manufacturing Company	100 Sargent Drive	25
New Haven	Gulf Oil Limited Partnership	GSI001571	Stormwater Associated With Industrial Activities	Gulf Oil Limited Partnership	500 Waterfront Street	37
New Haven	R & H Terminal, Llc	GSI001578	Stormwater Associated With Industrial Activities	R&H Terminal, Llc	120 Forbes Avenue	46
New Haven	Waterfront Enterprises, Inc.	GSI001719	Stormwater Associated With Industrial Activities	Wheeler Street Salt Storage	77 Wheeler Street	41
New Haven	Greater New Haven WPCA	GSI001893	Stormwater Associated With Industrial Activities	East Shore WPCF	345 E Shore Parkway	29
New Haven	Pequonnock Yacht Club, Inc.	GSI002074	Stormwater Associated With Industrial Activities	Pequonnock Yacht Club, Inc.	98 S Water Street	19
New Haven	CT DOT	GSN001792	Stormwater Registration - Construction Activities 5-10 Acres	New Haven Rail Yard	2 Brewery Street	24
New Haven	C.J. Fucci Construction Co.	GSN002081	Stormwater Registration - Construction Activities 5-10 Acres	Sewer Relocation Project	Forbes Avenue and Stiles Street	40
New Haven	CT DOT	GSN002179	Stormwater Registration - Construction Activities >10 Acres	Interchange Project	I-95 Bridge/Route 34 Interchange	24
New Haven	PSEG Power Connecticut, Llc	GSN002184	Stormwater Registration - Construction Activities >10 Acres	United Illuminating	1 Waterfront Street	26

Table 5: Permitted facilities in New Haven, CT that may be affecting the New Haven Estuary (continued)

Town	Client	Permit ID	Permit Type	Site Name	Address	Map #
New Haven	City Of New Haven	GSN002200	Stormwater Registration - Construction Activities 5-10 Acres	Hill Central School	140 Dewitt Street	38
New Haven	City Of New Haven	GSM00003 0	Part B Municipal Stormwater MS4	New Haven, City of	NA	NA
Orange	Lowe's Home Centers, Inc.	GSC000152	Stormwater Discharge Associated With Commercial Activity	Lowe's Home Centers, Inc.	50 Boston Post Road	18
Orange	Sam's East Inc	GSC000267	Stormwater Discharge Associated With Commercial Activity	Sam's Club #6442	2 Boston Post Road	32
Orange	Target Stores, Inc.	GSC000361	Stormwater Discharge Associated With Commercial Activity	Target Store	25 Boston Post Road	17
Orange	ABF Freight System, Inc.	GSI002326	Stormwater Associated With Industrial Activities	ABF Freight System, Inc.	56 Carlson Rd	15
Orange	ABF Freight System, Inc.	GSI002326	Stormwater Associated With Industrial Activities	ABF Freight System, Inc.	56 Carlson Rd	16
West Haven	City Of West Haven	CT0101079	Surface Water Permit	West Haven WPCF	2 Beach Street	7
West Haven	Wal-Mart Stores East, Lp	GSC000313	Stormwater Discharge Associated With Commercial Activity	Wal-Mart Store #3803	515 Saw Mill Road	10
West Haven	Star Distributors, Inc.	GSC000320	Stormwater Discharge Associated With Commercial Activity	Star Distributors, Inc.	10 Eder Road	2
West Haven	Enthone, Inc.	GSI000826	Stormwater Associated With Industrial Activities	Enthone, Inc.	350 Frontage Road	3
West Haven	West Cove Marina Corp.	GSI001013	Stormwater Associated With Industrial Activities	West Cove Marina	13 Kimberely Avenue	20
West Haven	Lakin Tire East, Inc.	GSI001025	Stormwater Associated With Industrial Activities	Lakin Tire East, Inc.	240 Frontage Road	4

Table 5: Permitted facilities in New Haven, CT that may be affecting the New Haven Estuary (continued)

Town	Client	Permit ID	Permit Type	Site Name	Address	Map #
West Haven	City Of West Haven	GSI001148	Stormwater Associated With Industrial Activities	West Haven Public Works Garage	1 Collis Street	14
West Haven	City Chemical Llc	GSI001193	Stormwater Associated With Industrial Activities	City Chemical Llc	139 Allings Crossing	5
West Haven	Connecticut Air National Guard	GSI001590	Stormwater Associated With Industrial Activities	Air Control Squadron	206 Boston Post Road	39
West Haven	John Degrand & Son, Inc	GSI001610	Stormwater Associated With Industrial Activities	John Degrand & Son, Inc.	430 Island Lane	1
West Haven	Kx Technologies Llc	GSI001920	Stormwater Associated With Industrial Activities	Kx Technologies Llc	55 Railroad Avenue	9
West Haven	Kx Technologies Llc	GSI002020	Stormwater Associated With Industrial Activities	Kx Technologies Llc	55 Railroad Avenue	8
West Haven	City Of West Haven	GSI002116	Stormwater Associated With Industrial Activities	West Haven WPCF	2 Beach Street	6
West Haven	City Of West Haven	GSM00000 2 / 200902139	Part B Municipal Stormwater MS4	West Haven, City Of	MS4 Permit	13
West Haven	Penske Truck Leasing Co.	GSN001716	Stormwater Registration - Construction Activities 5-10 Acres	Penske Truck Leasing Co.	38 Boston Post Road	23
West Haven	CT DOT	GSN002157	Stormwater Registration - Construction Activities >10 Acres	West Haven Railroad Station	Railroad Avenue to Hood Terrace	11

Table 6: Industrial permits affecting the New Haven Estuary and available fecal coliform data (colonies/100 mL). The results cannot be compared to the water quality standard as there is no single sample shellfish standard for fecal coliform.

Town	Location	Permit Number	Receiving Water	Sample Location	Sample Date	Result
Hamden	Williams Energy Ventures	GSI001374	New Haven Estuary	HAM-1	03/30/01	100
Hamden	Williams Energy Ventures	GSI001374	New Haven Estuary	HAM-1	05/13/02	2,060
Hamden	Williams Energy Ventures	GSI001374	New Haven Estuary	HAM-2	03/30/01	100
Hamden	Williams Energy Ventures	GSI001374	New Haven Estuary	HAM-2	05/13/02	1,120
Hamden	Williams Energy Ventures	GSI001374	New Haven Estuary	НАМ-3	03/30/01	100
Hamden	Williams Energy Ventures	GSI001374	New Haven Estuary	НАМ-3	05/13/02	2,320
New Haven	Simkins Industries	GSI000140	New Haven Estuary	A-East Building Mill #1	09/21/01	120
New Haven	Simkins Industries	GSI000140	New Haven Estuary	A-East Building Mill #1	06/05/02	24
New Haven	Simkins Industries	GSI000140	New Haven Estuary	B-West Building Mill #2	09/21/01	25
New Haven	Simkins Industries	GSI000140	New Haven Estuary	C-Outfall Building #12	09/21/01	35
New Haven	Simkins Industries	GSI000140	New Haven Estuary	C-Outfall Building #12	06/05/02	44
New Haven	New Haven WPCA	GSI000215	New Haven Estuary	#1	09/20/01	100
New Haven	New Haven WPCA	GSI000215	New Haven Estuary	#1	11/12/02	1,900
New Haven	New Haven WPCA	GSI000215	New Haven Estuary	#2	09/20/01	100
New Haven	New Haven WPCA	GSI000215	New Haven Estuary	#2	11/12/02	2,300
New Haven	New Haven WPCA	GSI000215	New Haven Estuary	#4	09/20/01	100
New Haven	New Haven WPCA	GSI000215	New Haven Estuary	#4	11/12/02	500
New Haven	H. Bixon & Sons	GSI000228	New Haven Estuary	003	07/26/01	6,400
New Haven	Gulf Oil Limited Partnership	GSI000442	New Haven Estuary	Outfall #1	07/26/01	90

Table 6: Industrial permits affecting the New Haven Estuary and available fecal coliform data (colonies/100mL). The results cannot be compared to the water quality standard as there is no single sample shellfish standard for fecal coliform. (continued)

Town	Location	Permit Number	Receiving Water	Sample Location	Sample Date	Result
New Haven	Sargent Manufacturing Company	GSI000492	New Haven Estuary	SW-S1	07/26/01	270
New Haven	Sargent Manufacturing Company	GSI000492	New Haven Estuary	SW-S2	07/26/01	60
New Haven	Sargent Manufacturing Company	GSI000492	New Haven Estuary	SW-S3	07/26/01	70
New Haven	Tilcon CT/Buchanan Marine	GSI000570	New Haven Estuary	001	07/05/01	600
New Haven	Tilcon CT/Buchanan Marine	GSI000570	New Haven Estuary	001	09/19/03	10
New Haven	Tilcon CT/Buchanan Marine	GSI000570	New Haven Estuary	001	09/08/04	10
New Haven	Gateway Terminal	GSI000656	New Haven Estuary	Gateway Terminal	09/14/01	100
New Haven	Gateway Terminal	GSI000656	New Haven Estuary	Gateway Terminal	08/29/02	100
New Haven	Connecticut Transit	GSI000774	New Haven Estuary	CB 003	07/26/01	10
New Haven	Connecticut Transit	GSI000774	New Haven Estuary	CB 003	11/11/02	70
New Haven	Connecticut Transit	GSI000774	New Haven Estuary	OF 006	07/26/01	430
New Haven	Connecticut Transit	GSI000774	New Haven Estuary	OF 006	11/11/02	260
New Haven	City of New Haven	GSI000800	New Haven Estuary	TRF Station East	09/25/01	46,000
New Haven	City of New Haven	GSI000800	New Haven Estuary	TRF Station East	09/26/02	100
New Haven	City of New Haven	GSI000800	New Haven Estuary	TRF Station West	09/25/01	169,000
New Haven	City of New Haven	GSI000800	New Haven Estuary	TRF Station West	09/26/02	500
New Haven	New Haven Terminal, Inc.	GSI000863	New Haven Estuary	1	08/20/01	2,500
New Haven	New Haven Terminal, Inc.	GSI000863	New Haven Estuary	1	08/20/02	>600
New Haven	U.S. Repeating Arms Co.	GSI000894	New Haven Estuary	001-SP	08/20/01	700
New Haven	U.S. Repeating Arms Co.	GSI000894	New Haven Estuary	001-SP	09/26/02	2,000

Table 6: Industrial permits affecting the New Haven Estuary and available fecal coliform data (colonies/100mL). The results cannot be compared to the water quality standard as there is no single sample shellfish standard for fecal coliform. (continued)

	Τ	Permit	Receiving	Sample	Sample	D 14
Town	Location	Number	Water	Location	Date	Result
New Haven	C. Cowles & Company	GSI000925	New Haven Estuary	parking lot	08/20/02	51,000
New Haven	C. Cowles & Company	GSI000925	New Haven Estuary	roof top	08/20/02	14,000
New Haven	Shore Line East Maintenance Facility	GSI000951	New Haven Estuary	SLE-1	08/23/01	100
New Haven	Shore Line East Maintenance Facility	GSI000951	New Haven Estuary	SLE-1	06/12/02	10
New Haven	Shore Line East Maintenance Facility	GSI000951	New Haven Estuary	SLE-2	08/23/01	100
New Haven	Shore Line East Maintenance Facility	GSI000951	New Haven Estuary	SLE-2	06/12/02	330
New Haven	New Haven Mfg Co. LLC	GSI001033	New Haven Estuary	Drainage Structure	07/11/01	900
New Haven	H. Krevit & Co	GSI001037	New Haven Estuary	parking lot	09/21/01	4,000
New Haven	H. Krevit & Co	GSI001037	New Haven Estuary	unknown	09/26/02	39,500
New Haven	H.B. Ives	GSI001038	New Haven Estuary	SS001	07/26/01	20
New Haven	H.B. Ives	GSI001038	New Haven Estuary	SS001	07/23/02	0
New Haven	H.B. Ives	GSI001038	New Haven Estuary	SS002	07/26/01	0
New Haven	H.B. Ives	GSI001038	New Haven Estuary	SS002	07/23/02	88
New Haven	H.B. Ives	GSI001038	New Haven Estuary	SS003	07/26/01	0
New Haven	H.B. Ives	GSI001038	New Haven Estuary	SS003	07/23/02	16
New Haven	United States Postal Service New Haven VMF	GSI001066	New Haven Estuary	SW-1	08/10/01	100
New Haven	United States Postal Service New Haven VMF	GSI001066	New Haven Estuary	SW-1	08/29/02	20,000
New Haven	Tweed New Haven Airport Authority	GSI001113	New Haven Estuary	1	11/12/02	600
New Haven	Tweed New Haven Airport Authority	GSI001113	New Haven Estuary	1	03/26/03	220
New Haven	Tweed New Haven Airport Authority	GSI001113	New Haven Estuary	1	08/17/03	9,600

Table 6: Industrial permits affecting the New Haven Estuary and available fecal coliform data (colonies/100mL). The results cannot be compared to the water quality standard as there is no single sample shellfish standard for fecal coliform. (continued)

Town	Location	Permit Number	Receiving Water	Sample Location	Sample Date	Result
New Haven	Tweed New Haven Airport Authority	GSI001113	New Haven Estuary	N end	07/05/01	2,500
New Haven	Tweed New Haven Airport Authority	GSI001113	New Haven Estuary	S end	07/05/01	2,400
New Haven	Tweed New Haven Airport Authority	GSI001113	New Haven Estuary	S end	11/20/01	1
New Haven	G & O Manufacturing	GSI001124	New Haven Estuary	unknown	09/14/01	100
New Haven	Getty Petroleum Marketing, Inc.	GSI001185	New Haven Estuary	Outfall #1	03/30/01	100
New Haven	Getty Petroleum Marketing, Inc.	GSI001185	New Haven Estuary	Outfall #1	05/28/02	10
New Haven	Motiva Enterprises, Llc	GSI001341	New Haven Estuary	M-1	07/26/01	>600
New Haven	Motiva Enterprises, Llc	GSI001341	New Haven Estuary	M-1	09/26/02	100
New Haven	Motiva Enterprises, Llc	GSI001341	New Haven Estuary	M-2	07/26/01	>600
New Haven	Motiva Enterprises, Llc	GSI001341	New Haven Estuary	M-2	09/26/02	500
New Haven	Motiva Enterprises, Llc	GSI001341	New Haven Estuary	M-3	07/26/01	>6000
New Haven	Motiva Enterprises, Llc	GSI001341	New Haven Estuary	M-3	09/26/02	100
New Haven	New Haven Rail Yard	GSI001356	New Haven Estuary	SW1	06/12/00	100
New Haven	New Haven Rail Yard	GSI001356	New Haven Estuary	SW2	06/12/00	3,100
New Haven	New Haven Rail Yard	GSI001356	New Haven Estuary	SW3	06/12/00	100
New Haven	New Haven Rail Yard	GSI001356	New Haven Estuary	SW4	06/12/00	100
New Haven	New Haven Rail Yard	GSI001356	New Haven Estuary	SW5	06/12/00	200
New Haven	Quinnipiac Energy	GSI001370	New Haven Estuary	SW-1	09/14/01	96
New Haven	Quinnipiac Energy	GSI001370	New Haven Estuary	SW-1	10/16/02	0
New Haven	Quinnipiac Energy	GSI001370	New Haven Estuary	SW-2	09/14/01	116

Table 6: Industrial permits affecting the New Haven Estuary and available fecal coliform data (colonies/100mL). The results cannot be compared to the water quality standard as there is no single sample shellfish standard for fecal coliform. (continued)

Town	Location	Permit Number	Receiving Water	Sample Location	Sample Date	Result
New Haven	Quinnipiac Energy	GSI001370	New Haven Estuary	SW-2	10/16/02	150
New Haven	Magellan Terminals Holdings, Lp	GSI001371	New Haven Estuary	FOR-1	07/11/01	10
New Haven	Magellan Terminals Holdings, Lp	GSI001371	New Haven Estuary	FOR-1	05/28/02	140
New Haven	Magellan Terminals Holdings, Lp	GSI001373	New Haven Estuary	East-1	08/24/01	2,500
New Haven	Magellan Terminals Holdings, Lp	GSI001373	New Haven Estuary	East-1	05/28/02	1,210
New Haven	Magellan Terminals Holdings, Lp	GSI001373	New Haven Estuary	East-2	08/24/01	200
New Haven	Magellan Terminals Holdings, Lp	GSI001373	New Haven Estuary	East-2	05/28/02	260
New Haven	Magellan Terminals Holdings, Lp	GSI001373	New Haven Estuary East-3		03/30/01	200
New Haven	Magellan Terminals Holdings, Lp	GSI001373	New Haven East-3		05/28/02	1,260
New Haven	Magellan Terminals Holdings, Lp	GSI001375	New Haven Estuary	280-1	03/30/01	100
New Haven	Magellan Terminals Holdings, Lp	GSI001375	New Haven Estuary	280-1	05/13/02	1,800
New Haven	Saint-Gobain Performance Plastics Corp.	GSI001379	New Haven Estuary	1 - N side building 1	07/26/01	100
New Haven	Saint-Gobain Performance Plastics Corp.	GSI001379	New Haven Estuary	1 - N side building 1	08/20/02	2,700
New Haven	Saint-Gobain Performance Plastics Corp.	GSI001379	New Haven Estuary	1 - N side building 1	06/18/03	10
New Haven	Saint-Gobain Performance Plastics Corp.	GSI001379	New Haven Estuary	2 - Trough rear E side	07/26/01	1,100
New Haven	Saint-Gobain Performance Plastics Corp.	GSI001379	New Haven Estuary	2 - Trough rear E side	08/20/02	1,000
New Haven	Saint-Gobain Performance Plastics Corp.	GSI001379	New Haven Estuary	2 - Trough rear E side	06/18/03	40
New Haven	Saint-Gobain Performance Plastics Corp.	GSI001379	New Haven 3 - CR N s		07/26/01	TNTC
New Haven	Saint-Gobain Performance Plastics Corp.	GSI001379	New Haven Estuary	3 - CB N side building 8	08/20/02	4,600
New Haven	Saint-Gobain Performance Plastics Corp.	GSI001379	New Haven Estuary	3 - CB N side building 8	06/18/03	>1000

Table 6: Industrial permits affecting the New Haven Estuary and available fecal coliform data (colonies/100mL). The results cannot be compared to the water quality standard as there is no single sample shellfish standard for fecal coliform. (continued)

Town	Location	Permit Receiving Number Water		Sample Location	Sample Date	Result
New Haven	Logistec USA, Inc.	GSI001420	New Haven Estuary	LNH-2	08/10/01	100
New Haven	Logistec USA, Inc.	GSI001420	New Haven Estuary	LNH-2	08/20/02	10
New Haven	Logistec USA, Inc.	GSI001420	New Haven Estuary	LNH-5	08/10/01	100
New Haven	Logistec USA, Inc.	GSI001420	New Haven Estuary	LNH-5	08/20/02	>600
New Haven	Wivest CT, LLC	GSI001435	New Haven Estuary	005	09/23/02	700
New Haven	Wivest CT, LLC	GSI001435	New Haven Estuary	002A	07/26/01	300
New Haven	Wivest CT, LLC	GSI001435	New Haven Estuary	002A	09/23/02	600
New Haven	Waste Management of CT	GSI001443	New Haven Estuary	New Haven SW corner		280
New Haven	Waste Management of CT	GSI001443	New Haven oil/water Estuary separator		07/10/03	TNTC
New Haven	New Haven Service & Inspection Facility	GSI001453	New Haven Estuary	S&I-1	08/23/01	100
New Haven	New Haven Service & Inspection Facility	GSI001453	New Haven Estuary	S&I-1	06/12/02	890
New Haven	Sargent Manufacturing Company	GSI001521	New Haven Estuary	SW-S1	08/29/02	60
New Haven	Sargent Manufacturing Company	GSI001521	New Haven Estuary	SW-S1	07/16/03	21,800
New Haven	Sargent Manufacturing Company	GSI001521	New Haven Estuary	SW-S2	08/29/02	10
New Haven	Sargent Manufacturing Company	GSI001521	New Haven Estuary	SW-S2	07/16/03	25,900
New Haven	Sargent Manufacturing Company	GSI001521	New Haven Estuary	SW-S3	08/29/02	10
New Haven	Sargent Manufacturing Company	GSI001521	New Haven Estuary	SW-S3	07/16/03	14,400
New Haven	First Student Inc.	GSI001542	New Haven Estuary	001	10/16/02	6,900
New Haven	First Student Inc.	GSI001542	New Haven Estuary	001	06/04/03	100
New Haven	Gulf Oil Limited Partnership	GSI001571	New Haven Estuary	Outfall #1	06/13/03	690

Table 6: Industrial permits affecting the New Haven Estuary and available fecal coliform data (colonies/100mL). The results cannot be compared to the water quality standard as there is no single sample shellfish standard for fecal coliform. (continued)

Town	Location	Permit Number	Receiving Water	Sample Location	Sample Date	Result
New Haven	R&H Terminal, Llc	GSI001578	New Haven Estuary	CB-1	09/26/02	1,500
New Haven	RSEG Power CT LLC NHHS	GSI001600	New Haven Estuary	back "B" DSN 005	07/07/03	6
New Haven	RSEG Power CT LLC NHHS	GSI001600	New Haven Estuary	front "A" DSN 002A	07/07/03	10
West Haven	The Bilco	GSI000644	New Haven Estuary	Drainage Pipe	07/11/01	1,250
West Haven	The Bilco	GSI000644	New Haven Estuary	Drainage Pipe	05/28/02	80
West Haven	The Bilco	GSI000644	New Haven Estuary	Drainage Pipe	05/01/03	100
West Haven	Enthone, Inc.	GSI000826	New Haven Estuary	B1S1	02/27/02	50
West Haven	Enthone, Inc.	GSI000826	New Haven Estuary B1S1		09/26/02	200
West Haven	Enthone, Inc.	GSI000826	New Haven Estuary	B1S1	09/23/03	100
West Haven	Enthone, Inc.	GSI000826	New Haven Estuary	B1S1	10/19/04	26
West Haven	Enthone, Inc.	GSI000826	New Haven Estuary	B1S2	02/27/02	700
West Haven	Enthone, Inc.	GSI000826	New Haven Estuary	B1S2	09/26/02	100
West Haven	Enthone, Inc.	GSI000826	New Haven Estuary	B1S2	09/23/03	100
West Haven	Enthone, Inc.	GSI000826	New Haven Estuary	B1S2	10/19/04	0
West Haven	West Cove Marina	GSI001013	New Haven Estuary	N end of yard	09/14/03	10,000
West Haven	Lakin Tire East, Inc.	GSI001025	New Haven Estuary	001	07/26/01	TNTC
West Haven	Lakin Tire East, Inc.	GSI001025	New Haven Estuary	001	08/20/02	>600
West Haven	Lakin Tire East, Inc.	GSI001025	New Haven Estuary	001	05/01/03	90
West Haven	Lakin Tire East, Inc.	GSI001025	New Haven Estuary	002	07/26/01	TNTC
West Haven	Lakin Tire East, Inc.	GSI001025	New Haven Estuary	002	08/20/02	60

Table 6: Industrial permits affecting the New Haven Estuary and available fecal coliform data (colonies/100mL). The results cannot be compared to the water quality standard as there is no single sample shellfish standard for fecal coliform. (continued)

Town	Location	Permit Receiving Number Water		Sample Location	Sample Date	Result
West Haven	Lakin Tire East, Inc.	GSI001025	New Haven Estuary	002	05/01/03	130
West Haven	Cover-It Inc.	GSI001177	New Haven Estuary	OF 001	10/11/02	2,000
West Haven	Cover-It Inc.	GSI001177	New Haven Estuary	OF 001	10/16/02	620
West Haven	Cover-It Inc.	GSI001177	New Haven Estuary OF 004		10/11/02	2,000
West Haven	Cover-It Inc.	GSI001177	New Haven Estuary	OF 004	10/16/02	1,290
West Haven	City Chemical Llc	GSI001193	New Haven Estuary	site #1	12/14/01	100
West Haven	City Chemical Llc	GSI001193	New Haven Estuary	site #1	10/16/02	10
West Haven	City Chemical Llc	GSI001193	New Haven Estuary	site #2	12/14/01	100
West Haven	City Chemical Llc	GSI001193	New Haven Estuary	site #2	10/16/02	10
West Haven	John Degrand & Son, Inc.	GSI001610	New Haven Estuary	OF-1	08/20/02	220
West Haven	John Degrand & Son, Inc.	GSI001610	New Haven Estuary	OF-2	08/20/02	1,200

Municipal Stormwater Permitted Sources

Per the EPA Phase II Stormwater rule all municipal storm sewer systems (MS4s) operators located within US Census Bureau Urbanized Areas (UAs) must be covered under MS4 permits regulated by the appropriate State agency. There is an EPA waiver process that municipalities can apply for to not participate in the MS4 program. In Connecticut, EPA has granted such waivers to 19 municipalities. All participating municipalities within UAs in Connecticut are currently regulated under MS4 permits by CT DEEP staff in the MS4 program.

The US Census Bureau defines a UA as a densely settled area that has a census population of at least 50,000. A UA generally consists of a geographic core of block groups or blocks that exceeds the 50,000 people threshold and has a population density of at least 1,000 people per square mile. The UA will also include adjacent block groups and blocks with at least 500 people per square mile. A UA consists of all or part of one or more incorporated places and/or census designated places, and may include additional territory outside of any place. (67 FR 11663)

For the 2000 Census a new geographic entity was created to supplement the UA blocks of land. This created a block known as an Urban Cluster (UC) and is slightly different than the UA. The definition of a UC is a densely settled area that has a census population of 2,500 to 49,999. A UC generally consists of a

geographic core of block groups or blocks that have a population density of at least 1,000 people per square mile, and adjacent block groups and blocks with at least 500 people per square mile. A UC consists of all or part of one or more incorporated places and/or census designated places; such a place(s) together with adjacent territory; or territory outside of any place. The major difference is the total population cap of 49,999 people for a UC compared to >50,000 people for a UA. (67 FR 11663)

While it is possible that CT DEEP will be expanding the reach of the MS4 program to include UC municipalities in the near future they are not currently under the permit. However, the GIS layers used to create the MS4 maps in this Statewide TMDL did include both UA and UC blocks. This factor creates some municipalities that appear to be within an MS4 program that are not currently regulated through an MS4 permit. This oversight can explain a municipality that is at least partially shaded grey in the maps and there are no active MS4 reporting materials or information included in the appropriate appendix. While these areas are not technically in the MS4 permit program, they are still considered urban by the cluster definition above and are likely to contribute similar stormwater discharges to affected waterbodies covered in this TMDL.

As previously noted, EPA can grant a waiver to a municipality to preclude their inclusion in the MS4 permit program. One reason a waiver could be granted is a municipality with a total population less than 1000 people, even if the municipality was located in a UA. There are 19 municipalities in Connecticut that have received waivers, this list is: Andover, Bozrah, Canterbury, Coventry, East Hampton, Franklin, Haddam, Killingworth, Litchfield, Lyme, New Hartford, Plainfield, Preston, Salem, Sherman, Sprague, Stafford, Washington, and Woodstock. There will be no MS4 reporting documents from these towns even if they are displayed in an MS4 area in the maps of this document. The list of US Census UCs is defined by geographic regions and is named for those regions, not necessarily by following municipal borders. In Connecticut the list of UCs includes blocks in the following Census Bureau regions: Colchester, Danielson, Lake Pocotopaug, Plainfield, Stafford, Storrs, Torrington, Willimantic, Winsted, and the border area with Westerly, RI (67 FR 11663). Any MS4 maps showing these municipalities may show grey areas that are not currently regulated by the CT DEEP MS4 permit program.

The impaired segment in the New Haven Estuary is located within the Cities of New Haven and West Haven, CT. New Haven and West Haven have designated urban areas, as defined by the U.S. Census Bureau and are required to comply with the General Permit for the Discharge of Stormwater from Small Municipal Storm Sewer Systems (MS4 permit) issued by CT DEEP (Figure 5). This general permit is only applicable to municipalities that are identified in Appendix A of the MS4 permit that contain designated urban areas and discharge stormwater via a separate storm sewer system to surface waters of the State. The permit requires municipalities to develop a Stormwater Management Plan (SMP) to reduce the discharge of pollutants as well as protect water quality. The MS4 permit is discussed further in the "TMDL Implementation Guidance" section of the core TMDL document. Additional information regarding stormwater management and the MS4 permit can be obtained on CTDEEP's website (http://www.ct.gov/dep/cwp/view.asp?a=2721&q=325702&depNay_GID=1654).

There are potentially thirteen MS4 outfalls that have been sampled for *E. coli* bacteria in the watershed in New Haven and West Haven, discharging either directly to the New Haven Estuary or indirectly via the West River, Cove River, and Quinnipiac River (Table 7). Although the results cannot be compared to the water quality standard as there is no single sample shellfish standard for *E. coli*, high counts were detected at all eight outfalls in New Haven and all five outfalls in West Haven, particularly the commercial and industrial permitted outfalls at Brewery Street across from Ikea, Essex Street, and Connecticut Avenue across from Motiva.

Table 7: List of MS4 sample locations and $E.\ coli$ (colonies/100 mL) results in the New Haven Estuary. The results cannot be compared to the water quality standard as there is no single sample shellfish standard for $E.\ coli$.

Town	Location	MS4 Type	Receiving Waters	Sample Date	Result
New Haven	109 Brewery Street	Commercial	LIS	11/09/05	750
New Haven	109 Brewery Street	Commercial	LIS	10/17/06	>4000
New Haven	109 Brewery Street	Commercial	LIS	09/11/07	>2000
New Haven	109 Brewery Street	Commercial	LIS	09/27/10	12,000
New Haven	70 Chapel Street bridge	Residential	West River	06/28/05	20,100
New Haven	70 Chapel Street bridge	Residential	West River	11/09/05	850
New Haven	70 Chapel Street bridge	Residential	West River	10/17/06	>4000
New Haven	70 Chapel Street bridge	Residential	West River	09/11/07	>2000
New Haven	70 Chapel Street bridge	Residential	West River	09/27/10	6,400
New Haven	Brewery Street across from Ikea	Commercial	LIS	06/28/05	30,100
New Haven	CB 147	Industrial	Quinnipiac River	11/09/05	450
New Haven	CB 147	Industrial	Quinnipiac River	10/17/06	500
New Haven	CB 147	Industrial	Quinnipiac River	09/11/07	>2000
New Haven	CB 147	Industrial	Quinnipiac River	09/27/10	2,800
New Haven	Connecticut Avenue across from Motiva	Industrial	LIS	06/28/05	29,700
New Haven	Essex Street	Commercial	Quinnipiac River	06/28/05	36,100
New Haven	Essex Street	Commercial	Quinnipiac River	11/09/05	90
New Haven	Essex Street	Commercial	Quinnipiac River	10/17/06	>4000
New Haven	Essex Street	Commercial	Quinnipiac River	09/11/07	>2000
New Haven	Essex Street	Commercial	Quinnipiac River	09/27/10	1,300
New Haven	Hemingway Street	Residential	Quinnipiac River	06/28/05	12,400
New Haven	Hemingway Street	Residential	Quinnipiac River	11/09/05	10
New Haven	Hemingway Street	Residential	Quinnipiac River	10/17/06	>4000
New Haven	Hemingway Street	Residential	Quinnipiac River	09/11/07	>2000
New Haven	Hemingway Street	Residential	Quinnipiac River	09/27/10	8,500
New Haven	Wheeler Street	Industrial	Quinnipiac River	06/28/05	3,700
New Haven	Wheeler Street	Industrial	Quinnipiac River	11/09/05	10
New Haven	Wheeler Street	Industrial	Quinnipiac River	10/17/06	1,000
New Haven	Wheeler Street	Industrial	Quinnipiac River	09/11/07	>2000
New Haven	Wheeler Street	Industrial	Quinnipiac River	09/27/10	3,500
West Haven	Elm Street	Commercial	LIS	12/01/04	1,800
West Haven	Elm Street	Commercial	LIS	09/15/05	TNTC
West Haven	Elm Street	Commercial	LIS	09/14/06	700
West Haven	Elm Street	Commercial	LIS	11/20/07	TNTC

Table 7: List of MS4 sample locations and *E. coli* (colonies/100 mL) results in the New Haven Estuary. The results cannot be compared to the water quality standard as there is no single sample shellfish standard for *E. coli*. (continued)

Town	Location	MS4 Type	Receiving Waters	Sample Date	Result
West Haven	Elm Street	Commercial	LIS	12/11/08	1,700
West Haven	Elm Street	Commercial	LIS	09/11/09	2,000
West Haven	Industry Road	Industrial	Cove River	12/01/04	2,600
West Haven	Lake Street	Residential	LIS	12/01/04	3,100
West Haven	Lake Street	Residential	LIS	09/15/05	TNTC
West Haven	Lake Street	Residential	LIS	09/14/06	15,000
West Haven	Lake Street	Residential	LIS	11/20/07	TNTC
West Haven	Lake Street	Residential	LIS	12/11/08	7,600
West Haven	Lake Street	Residential	LIS	09/11/09	2,000
West Haven	Oaks Street	Commercial	LIS	12/01/04	TNTC
West Haven	Oaks Street	Commercial	LIS	09/15/05	TNTC
West Haven	Oaks Street	Commercial	LIS	09/14/06	180
West Haven	Oaks Street	Commercial	LIS	12/11/08	1,800
West Haven	Oaks Street	Commercial	LIS	09/11/09	2,000
West Haven	Winkle Bus/Freshmeadow Road	Industrial	Cove River	09/15/05	TNTC
West Haven	Winkle Bus/Freshmeadow Road	Industrial	Cove River	09/14/06	1,100
West Haven	Winkle Bus/Freshmeadow Road	Industrial	Cove River	11/20/07	440
West Haven	Winkle Bus/Freshmeadow Road	Industrial	Cove River	12/11/08	TNTC
West Haven	Winkle Bus/Freshmeadow Road	Industrial	Cove River	09/11/09	2,000

Figure 5: MS4 areas near the New Haven Estuary



Publicly Owned Treatment Works

The New Haven East Shore Water Pollution Control Facility (WPCF) (CT0100366) and the West Haven WPCF (CT0101079) discharge to the Prohibited waters of New Haven Harbor and have the potential to impact the shellfish growing waters in the New Haven Estuary (New Haven, 2008; Figure 4). According to the 2008 New Haven Estuary Report, the IEC inspected the effluent from the New Haven East Shore WPCF plant from 2006-2008 and two permit exceedances were reported in 2007. There were 45 bypasses in 2008 at the New Haven East Shore WPCF, two of which resulted in shellfish bed closures in the New Haven Estuary. The 2008 New Haven Estuary Report also identified 30 pump stations, 15 of which are near major waterbodies connected to the New Haven Estuary (New Haven, 2008). Bacteria data from the effluent of the New Haven East Shore WPCF and West Haven WPCF are included in Table 8. West Haven WPCF exceeded its 7-day geometric mean on 5/31/2009.

Table 8: Wastewater treatment plant fecal coliform (colonies/100 mL) data discharging to the New Haven Estuary

Town	Permitee	Permit Number	Receiving Water	Date	30-Day Geometric Mean	7-Day Geometric Mean
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	01/31/09	No data	8
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	04/30/09	7	10
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	05/31/09	No data	18
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	06/30/09	No data	7
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	08/31/09	No data	25
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	09/30/09	No data	9
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	10/31/09	No data	35
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	11/30/09	No data	8
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	12/31/09	No data	11
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	01/31/10	No data	13
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	02/28/10	No data	15
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	03/31/10	No data	16
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	06/30/10	No data	6
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	07/31/10	No data	17

Table 8: Wastewater treatment plant fecal coliform (colonies/100 mL) data discharging to the New Haven Estuary (continued)

Town	Permitee	Permit Number	Receiving Water	Date	30-Day Geometric Mean	7-Day Geometric Mean
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	08/31/10	No data	4
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	09/30/10	No data	21
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	10/31/10	No data	19
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	11/30/10	No data	4
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	01/31/11	No data	4
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	05/31/11	No data	10
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	06/30/11	No data	3
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	07/31/11	No data	9
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor			14
New Haven	New Haven East Shore WPCF	CT0100366	New Haven Estuary - New Haven Harbor	09/30/11	12	43
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	01/31/09	9	44
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	02/28/09	9	70
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	03/31/09	19	57
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	04/30/09	42	88
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	05/31/09	16	495
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	06/30/09	25	247
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	07/31/09	19	69
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	08/31/09	6	17
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	09/30/09	6	14
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	10/31/09	12	46

Table 8: Wastewater treatment plant fecal coliform (colonies/100 mL) data discharging to the New Haven Estuary (continued)

Town	Permitee	Permit Number	Receiving Water	Date	30-Day Geometric Mean	7-Day Geometric Mean
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	11/30/09	8	46
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	12/31/09	23	178
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	01/31/10	4	69
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	02/28/10	14	86
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	03/31/10	6	74
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	04/30/10	3	7
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	05/31/10	6	18
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	06/30/10	3	16
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor			7
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	08/31/10	5	30
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	09/30/10	4	27
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	10/31/10	2	10
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	11/30/10	4	17
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	12/31/10	2	3
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	01/31/11	4	7
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	02/28/11	6	12
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	03/31/11	5	19
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	05/31/11	12	30
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	06/30/11	38	No data
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	07/31/11	No data	18
West Haven	West Haven WPCF	CT0101079	New Haven Estuary - New Haven Harbor	08/31/11	9	32

30-Day Geometric Mean Permit Limit = 200 colonies/100 mL

7-Day Geometric Mean Permit Limit = 400 colonies/100 mL

Non-point Sources

Non-point source (NPS) pollution comes from many diffuse sources and is more difficult to identify and control. NPS pollution is often associated with certain land-use practices. Examples of NPS that can contribute bacteria to surface waters include stormwater runoff, illicit discharges, insufficient septic systems, pet and wildlife waste, agriculture, and contact recreation (swimming or wading). With the waters of the New Haven Estuary being tidally influenced, many bacterial sources that appear to be downstream of the impaired segment may be affecting the water quality in upstream segments. Potential sources of NPS to the impaired segments in the New Haven Estuary are described below.

Combined Sewer Overflows (CSOs)

CSOs represent a likely source of bacterial contamination within the New Haven Estuary. Combined sewer systems carry water from both sanitary and storm sewers to publicly owned treatment works (POTW). Storm sewers collect large volumes of water during significant rain events. When this incoming volume of water surpasses the capacity of a POTW, the combined sewers overflow at designated CSOs to reduce the volume of water entering the facility. Overflowing combined sewers will deposit raw sewage with high levels of bacteria into the receiving water. As shown in Figure 4, there are 7 CSOs identified around New Haven Harbor in New Haven near the impaired segment. According to the 2008 New Haven Estuary Report, there are 22 active CSOs. These CSOs may be contributing bacteria to New Haven Harbor and are a likely source of bacterial contamination to the impaired segment of the New Haven Estuary.

Stormwater Runoff from Developed Areas

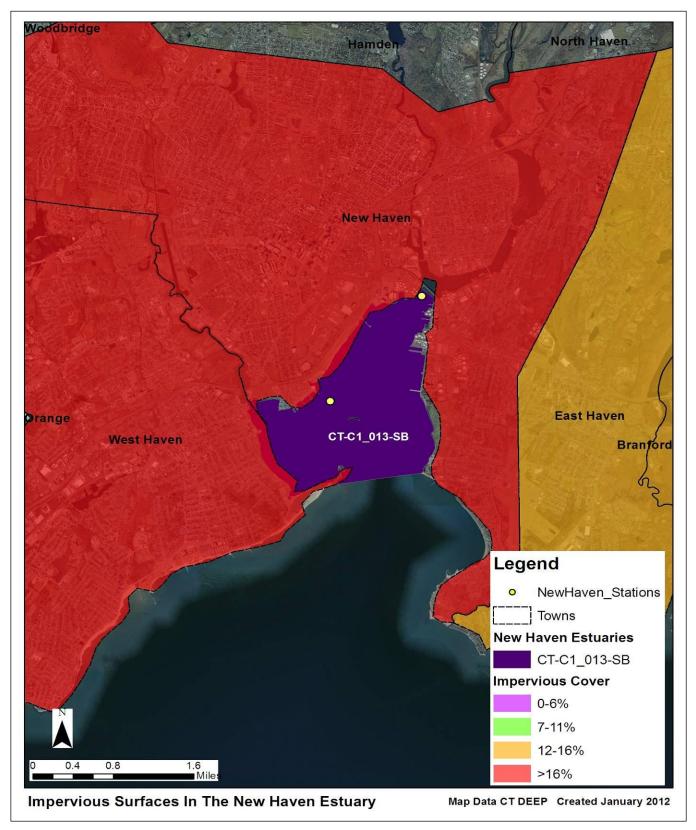
The City of New Haven and West Haven are heavily developed. Impervious surfaces, or surface areas such as roofs and roads that force water to run off land surfaces rather than infiltrate soil, often characterize developed areas. Studies have shown a link between the amount of impervious area in a watershed and water quality conditions (CWP, 2003). In one study, researchers correlated the amount of fecal coliform to the percentage of land with impervious cover in a watershed (Mallin *et al.*, 2000). According to the 2008 New Haven Estuary Report, commercial and industrial development around New Haven Harbor, a major shipping port for petroleum products and commercial fishing vessels, has increased total impervious cover along the coastal regions of New Haven and West Haven, which has increased stormwater runoff to the estuary. Coastal land bordering the New Haven Estuary in the Cities of New Haven and West Haven exceed 16% impervious surfaces (Figure 6).

Illicit Discharges and Insufficient Septic Systems

As shown in Figure 4, the majority of New Haven and West Haven rely on a municipal sanitary sewer system. Sewer system leaks and other illicit discharges can contribute bacteria to nearby surface waters. According to the 2008 New Haven Estuary Report, there were several pump station and sewer line failures reported in 2008 that deposited raw sewage directly to the estuary, including an electrical failure at Woodward Avenue pump station, mechanical equipment failure at the New Haven East Shore WPCF and East Street pump station, and a ruptured contractor hose at the Lock Street catch basin. There are also three pump-out facilities for boats, one of which is located on Long Wharf in New Haven Harbor. A portion of the watershed, particularly on the east side of New Haven Harbor in New Haven, also relies on onsite wastewater treatment systems, such as septic systems. Properly managed septic systems and leach fields have the ability to effectively remove bacteria from waste. If systems are not maintained, waste will not be adequately treated and may result in bacteria reaching nearby surface and ground water. In Connecticut, local health directors or health districts are responsible for keeping track of any reported insufficient or failing septic systems in a specific municipality. The City of New Haven has a full-time

health director (http://www.cityofnewhaven.com/Health/). The City of West Haven has a full-time health director (http://www.whhd.org/).

Figure 6: Impervious cover (%) for New Haven and West Haven, CT



Wildlife and Domestic Animal Waste

Wildlife and domestic animals within the municipalities of New Haven and West Haven, including those present in the estuary, represent another potential source of bacteria to the impaired waterbodies. Elevated bacteria levels due solely to a natural population of wildlife are not subject to the WQS. However, any exacerbation of wildlife population sizes or residency times influenced by human activities is subject to the CT WQS and TMDL provisions. With the construction of roads and drainage systems, wastes from wildlife may no longer be retained on the landscape, but instead may be conveyed via stormwater to the nearest surface waterbody. As such, physical land alterations can exacerbate the impact of these natural sources on water quality (USEPA, 2001).

Two large recreational areas, East Shore Park in New Haven and Morse Park in West Haven, are located along the shoreline of New Haven Harbor. Geese and other waterfowl are known to congregate in open areas, including recreational fields, agricultural crop fields, and golf courses. In addition to creating a nuisance, large numbers of geese can create unsanitary conditions on the grassed areas and cause water quality problems due to bacterial contamination associated with their droppings. Large populations of geese can also lead to habitat destruction as a result of overgrazing on wetland and riparian plants. Multiple locations of concentrated migratory waterfowl have been identified throughout the New Haven Estuary, including within Segment 1 (CT-C1_013-SB) of New Haven Harbor (Figure 4).

As indicated previously, portions of New Haven and West Haven near the estuary are heavily developed with commercial and residential properties. As such, waste from domestic animals, such as dogs, may also be contributing to bacteria concentrations in the impaired segment in the New Haven Estuary.

Marinas

As noted previously, multiple marinas are located within the New Haven Estuary at New Haven Harbor (Figure 4 and Table 5). Marinas are located at the water's edge, and if no measures are taken to reduce pollutants, including buffering, pollutants can be transported via runoff from parking lots and hull maintenance areas directly into the marina basin. Common pollutants from marinas include bacteria and nutrients from stormwater runoff, solid and liquid materials used in boat maintenance and cleaning, fuel and oil, sewage from public restrooms and boat pump-outs, fish waste, and turbidity from boating activities. The use of pump out boats and facilities dramatically reduce bacteria loading from boats. The CT DEEP has information on regional pump-out boats and facilities at its website, http://www.ct.gov/dep/cwp/view.asp?a=2705&q=323708&depNav_GID=1711. There are several pump-out locations in the New Haven region. The service is free and eliminates the possibility of vessels dumping raw wastes into Long Island Sound, which is prohibited by CT Water Quality Standards Number 24, "the discharge of sewage from any vessel to any water is prohibited."

Recreation

People coming in direct contact with surface water presents another potential source of bacterial contamination. Microbial source tracking (MST) surveys conducted in New Hampshire have shown humans to be a source of bacterial contamination at beaches (Jones, 2008). It is probable that some bacterial contamination can be attributed to human activities in the New Haven Estuary.

Additional Sources

Two water permits through the National Pollutant Discharge Elimination System (NPDES) program, which regulates the type and nature of discharges to waterbodies, were identified in New Haven and one in West Haven (Figure 4). The 2008 New Haven Estuary Report identified several other permitted NPDES discharges, including a hazardous waste terminal, several petroleum terminals, shipping terminals, and the US Coast Guard Station. Four landfills were also identified in Figure 4, one of which is near the shoreline of the New Haven Harbor. The 2008 New Haven Estuary Report identified a capped landfill on the Little River, a tributary to the Quinnipiac River that drains to Prohibited waters in New Haven Harbor, and an abandoned landfill on West River that also drains to New Haven Harbor.

There may be other sources not listed here or identified in Figure 4 that contribute to the observed water quality impairment in the New Haven Estuary. Further monitoring and investigation will confirm listed sources and discover additional ones. More detailed evaluation of potential sources is expected to become available as activities are conducted to implement this TMDL.

CURRENT MANAGEMENT ACTIVITIES

The Cities of New Haven and West Haven have developed and implemented programs to protect water quality from bacterial contamination. In addition, the National Shellfish Sanitation Program (NSSP) has multiple requirements for the protection and evaluation of shellfish growing areas. More information about this program is provided below and available online: http://www.fda.gov/Food/FoodSafety/Product-SpecificInformation/Seafood/FederalStatePrograms/NationalShellfishSanitationProgram/ucm053724.htm.

The NSSP requires the completion of a sanitary survey to determine acceptable and unacceptable growing areas, and to accurately classify a growing area as Approved, Conditionally Approved, Restricted, Conditionally Restricted, or Prohibited. A sanitary survey is an in-depth evaluation of all environmental factors impacting water quality in a shellfish growing area. Environmental factors include both actual and potential pollutant sources, whether natural or man-made, along with meteorological and hydrographic characteristics of the growing area. The principal components of a sanitary survey are: (1) identification and evaluation of pollutant sources, (2) evaluation of meteorological factors, (3) evaluation of hydrographic factors affecting the distribution of pollutants, and (4) assessment of water quality.

The sanitary survey includes data and results from the following:

- 1. Shoreline survey;
- 2. Survey of the bacteriological quality of the water;
- 3. Evaluation of meteorological, hydrodynamic, and geographic characteristics of the growing area:
- 4. Analysis of shoreline survey, bacteriological water quality, and meteorological, hydrodynamic, and geographic characteristics; and
- 5. Determination of the appropriate growing area classification

Maintaining updated sanitary survey records consists primarily of routinely evaluating major pollutant sources, collecting water quality data from sampling stations under the selected NSSP water quality monitoring strategy, and analyzing the data to ensure that the classification continues to represent current sanitary conditions in the growing area. The entire sanitary survey process must be repeated every 12 years. In the interim, the sanitary quality of each growing area must be reviewed as often as necessary to ensure appropriate classification. Certain sanitary survey components are required by the Model Ordinance to be updated annually and triennially.

The growing area classification and supporting data from the sanitary survey shall be reviewed at least every three years. As required by the NSSP, this triennial re-evaluation shall include:

- 1. A review of water quality sampling results;
- 2. Documentation of any new pollutant sources and evaluation of their impact on the growing area;
- 3. Re-evaluation of all pollutant sources, including sources previously identified in the sanitary survey, as necessary to fully evaluate any changes in the sanitary conditions of the growing area. Re-evaluation may or may not include a site visit;
- 4. A comprehensive report analyzing the sanitary survey data and determining whether the existing growing area classification is accurate or requires revision; and
- 5. Reclassification of the growing area if re-evaluation determines that conditions for classification have changed based on data collected during the triennial review

NSSP also requires that the sanitary survey be updated annually to reflect changes in conditions in the growing area. The annual re-evaluation shall include:

- 1. Field observation of pollutant sources during drive-through surveys, sample collections, or other information sources;
- 2. Addition and review of current year's water quality sampling results to a database collected in accordance with the bacteriological standards and sample collection required;
- 3. Review of available inspection reports and effluent samples collected from pollutant sources;
- 4. Review of available performance standards for various types of discharges impacting the growing area; and
- 5. A brief report documenting annual re-evaluation findings.

The most recent annual assessment of the shellfish growing waters in the City of New Haven was published in 2008 (New Haven, 2008). According to this report, all growing areas are correctly classified based on pollution source re-evaluation and fecal coliform data from 2006-2008. There are no Approved areas in the New Haven Estuary due to high point and nonpoint source pollution from New Haven Harbor.

Other efforts have been taken by New Haven and West Haven to reduce bacteria to its surface waters. As indicated previously, New Haven and West Haven are regulated under the MS4 program. The MS4 General Permit is required for any municipality with urbanized areas that initiates, creates, originates or maintains any discharge of stormwater from a storm sewer system to waters of the State. The MS4 permit requires towns to design a Stormwater Management Plan (SMP) that reduces the discharge of stormwater pollutants to improve water quality. The plan must address the following six minimum measures:

- 1. Public Education and Outreach.
- 2. Public Involvement/Participation.
- 3. Illicit discharge detection and elimination.
- 4. Construction site stormwater runoff control.
- 5. Post-construction stormwater management in the new development and redevelopment.
- 6. Pollution prevention/good housekeeping for municipal operations.

Each municipality is also required to submit an annual update outlining steps taken to meet the six minimum measures. The most recent updates that address bacterial contamination in the watershed are summarized in Tables 9 and 10.

Table 9: Summary of MS4 requirement updates related to the reduction of bacterial contamination from New Haven, CT (Permit # GSM000030)

Minimum Measure	New Haven Annual Report 2009
Public Outreach and Education	1) Produced a "green" pamphlet regarding stormwater protection.
Public Involvement and Participation	1) Conducted volunteer catch basin stenciling.
Illicit Discharge Detection and Elimination	1) No updates.
Construction Site Stormwater Runoff Control	1) Will form a Stormwater Authority to incorporate ordinances.
Post Construction Stormwater Management	1) Increased use of dry wells in new development and construction sites.
Pollution Prevention and Good Housekeeping	1) No updates.

Table 10: Summary of MS4 requirement updates related to the reduction of bacterial contamination from West Haven, CT (Permit # GSM000002)

Minimum Measure	West Haven Annual Report (November 2009)		
	1) Conducted annual beach clean-ups.		
Public Outreach and Education	2) Worked with Beautification Committee to plant along roadways.		
	3) Created Stormwater Committee.		
Public Involvement and Participation	1) Placed educational stickers on city trash barrels, recycling bins, and school signs.		
-	2) Developed a waste/recycling brochure and mailed to residents.		
	1) Responded to a citizen complaint on Mohawk Drive.		
HILL S. D. C. C. I	2) Sampled six outfalls during wet-weather.		
Illicit Discharge Detection and Elimination	3) Monitored outfall screening for illicit discharges and responded to citizen complaints.		
	4) Completed mapping of the storm sewer system.		
Construction Site Stormwater Runoff Control	1) Conducted random inspections for construction operator compliance.		
Post Construction Stormwater Management	No updates.		
	1) Catch basin cleaning conducted as necessary.		
Pollution Prevention and Good Housekeeping	2) Maintains records of storm water facilities and repairs.		
110 discheoping	3) Swept 127 miles of town roads.		

RECOMMENDED NEXT STEPS

New Haven and West Haven have developed and implemented programs to protect water quality from bacterial contamination. Future mitigative activities are necessary to ensure the long-term protection of Segment 1 in the New Haven Estuary and have been prioritized below.

1) Implement a plan to remove all CSOs in the New Haven Estuary watershed.

There are multiple CSOs located near New Haven Harbor and the impaired segment of the New Haven Estuary. The Greater New Haven Water Pollution Control Authority (GNHWPCA) is a regional water pollution authority covering the municipalities of New Haven, East Haven, Hamden, and Woodbridge (www.gnhwpca.com). GNHWPCA is in the process of implementing a program to remove all CSOs within its jurisdiction with the goal to improve water quality at the West River, Mill River, Quinnipiac River, New Haven Harbor, and Long Island Sound (GNHWPCA, 2011).

Removal of CSOs is cost inhibitive, and municipalities do not have the resources to take on such a task on their own. To help implement these large scale projects, the State of Connecticut developed the Connecticut Clean Water Fund (CWF), which provides financial assistance to municipalities for the planning, design, and construction of wastewater collection and treatment projects. The CWF covers 20% of the project cost and provides a low interest loan for the remaining balance. However, the CWF also provides a special incentive for CSO correction or removal projects, covering 50% of the project cost in addition to the low interest loan (CTDEEP (CWF), 2011). It is important for the City of New Haven to continue supporting the efforts of the GNHWPCA because removing the CSOs along the shoreline of New Haven Harbor will help reduce bacteria concentrations within the New Haven Estuary.

2) Continue monitoring of permitted sources.

There are at least 47 permitted sources in the New Haven Estuary, some of which have shown historically high bacteria concentrations. Further monitoring will provide information essential to better locate, understand, and reduce pollution sources. If any current monitoring is not done with appropriate bacterial indicator based on the receiving water, then a recommended change during the next permit reissuance is to include the appropriate indicator species. If facility monitoring indicates elevated bacteria, then implementation of permit is required, and any voluntary measures to identify and reduce sources of bacterial contamination at the facility are also recommended. Regular monitoring should be established for all permitted sources to ensure compliance with permit requirements and to determine if current requirements are adequate or if additional measures are necessary for water quality protection.

Section 6(k) of the MS4 General Permit requires a municipality to modify their Stormwater Management Plan to implement the TMDL within four months of TMDL approval by EPA if stormwater within the municipality contributes pollutant(s) in excess of the allocation established by the TMDL. For discharges to impaired waterbodies, the municipality must assess and modify the six minimum measures of its plan, if necessary, to meet TMDL standards. Particular focus should be placed on the following plan components: public education, illicit discharge detection and elimination, stormwater structures cleaning, and the repair, upgrade, or retrofit of storm sewer structures. The goal of these modifications is to establish a program that improves water quality consistent with TMDL requirements. Modifications to the Stormwater Management Plan in response to TMDL development should be submitted to the Stormwater Program of DEEP for review and approval.

Tables 11 and 12 detail the appropriate bacteria criteria for use as waste load allocations established by this TMDL for use as water quality targets by permittees as permits are renewed and updated, within the New Haven Estuary.

For any municipality subject to an MS4 permit and affected by a TMDL, the permit requires a modification of the SMP to include BMPs that address the included impairment. In the case of bacteria related impairments municipal BMPs could include: implementation or improvement to existing nuisance wildlife programs, septic system monitoring programs, any additional measures that can be added to the required illicit discharge detection and elimination (IDDE) programs, and increased street sweeping above basic permit requirements. Any non-MS4 municipalities can implement these same types of initiatives in effort to reduce bacteria source loading to impaired waterways.

Any facilities that discharge non-MS4 regulated stormwater should update their Pollution Prevention Plan to reflect BMPs that can reduce bacteria loading to the receiving waterway. These BMPs could include nuisance wildlife control programs and any installations that increase surface infiltration to reduce overall stormwater volumes. Facilities that are regulated under the Commercial Activities Stormwater Permit should report any updates to their SMP in their summary documentation submitted to DEEP.

Table 11. Bacteria (Enterococci) TMDLs, WLAs, and LAs for Recreational Uses.

		Insta	Instantaneous Enterococcus (#/100mL)			Geometric Mean Enterococcus (#/100mL)	
Class	Bacteria Source	WI	LA ⁶	L	A^6	WLA ⁶	LA ⁶
	Recreational Use	1	2	1	3	All	All
	Non-Stormwater NPDES	104	500			35	
	CSOs	104	500			35	
	SSOs	0	0			0	
	OBDs ⁴	0	0			0	
F	Illicit sewer connection	0	0			0	
SB ⁵	Leaking sewer lines	0	0			0	
	Stormwater (MS4s)	104 ⁷	500 ⁷			35 ⁷	
	Stormwater (non-MS4)			104 ⁷	500 ⁷		35 ⁷
	Wildlife direct discharge			104 ⁷	500 ⁷		35 ⁷
	Human or domestic animal direct discharge ³			104	500		35

- (1) Designated Swimming. Procedures for monitoring and closure of bathing areas by State and Local Health Authorities are specified in: <u>Guidelines for Monitoring Bathing Waters and Closure Protocol</u>, adopted jointly by the Department of Environmental Protections and the Department of Public Health. May 1989. Revised April 2003 and updated December 2008.
- (2) **Non-Designated Swimming.** Includes areas otherwise suitable for swimming but which have not been designated by State or Local authorities as bathing areas, waters which support tubing, water skiing, or other recreational activities where full body contact is likely.
- (3) All Other Recreational Uses.
- (4) Criteria for the protection of recreational uses in Class B waters do not apply when disinfection of sewage treatment plant effluents is not required consistent with Standard 23. (Class B surface waters located north of Interstate Highway I-95 and downstream of a sewage treatment plant providing seasonal disinfection May 1 through October 1, as authorized by the Commissioner.)
- (5) Human direct discharge = swimmers
- (6) Unless otherwise required by statute or regulation, compliance with this TMDL will be based on ambient concentrations and not end-of-pipe bacteria concentrations

(7) Replace numeric value with "natural levels" if only source is naturally occurring wildlife. Natural is defined as the biological, chemical and physical conditions and communities that occur within the environment which are unaffected or minimally affected by human influences (CT DEEP 2011a). Sections 2.2.2 and 6.2.7 of this Core Document deal with BMPs and delineating type of wildlife inputs.

Table 12: Bacteria (Fecal Coliform) TMDLs WLAs, and LAs for Shellfish Harvesting Areas.

			Mean Fecal (#/100mL) ⁴	90% less than Statistical measure Fecal Coliform (#/100mL) ⁴		
Class	Bacteria Source ¹	WLA ⁵	LA ⁵	WLA ⁵	LA ⁵	
	CSOs	14		31		
	SSOs	0		0		
	OBDs ³	0		0		
	Illicit sewer connection	0		0		
SA Direct Consumption	Leaking sewer lines	0		0		
	Stormwater (MS4s)	14 ⁶		31 ⁶		
	Stormwater (non-MS4)		14 ⁶		31 ⁶	
	Wildlife direct discharge		14 ⁶		31 ⁶	
	Human or domestic animal direct discharge ²		14		31	
	Non-Stormwater NPDES	88		260		
	CSOs	88		260		
	SSOs	0		0		
	OBDs ³	0		0		
SB Indirect Consumption	Illicit sewer connection	0		0		
	Leaking sewer lines	0		0		
	Stormwater (MS4s)	88 ⁶		260 ⁶		
	Stormwater (non-MS4)		88 ⁶		260 ⁶	
	Wildlife direct discharge		88 ⁶		260 ⁶	
	Human or domestic animal direct discharge ²		88		260	

⁽¹⁾ Criteria are based on utilizing the mTec method as specified in the U.S. Food and Drug Administration National Shellfish Sanitation Program-Model Ordinance (NSSP-MO) document *Guide for the Control of Molluscan Shellfish 2007.*

3) Identify areas in New Haven and West Haven to implement Best Management Practices (BMPs) to control stormwater runoff.

As noted previously, New Haven and West Haven near the New Haven Estuary have impervious cover greater than 16% and are urban areas regulated under the MS4 program. As such, stormwater runoff is likely contributing bacteria to the New Haven Estuary. To identify areas that are contributing bacteria to the impaired segments, municipalities should conduct wet-weather sampling at stormwater outfalls that discharge directly to the impaired segment in the New Haven Estuary. To treat stormwater runoff, the

⁽²⁾ Human direct discharge = swimmers

⁽³⁾ All coastal and inland waters in Connecticut are designated as No Discharge Areas for Overboard Discharges (OBDs) from marine vessels with Marine Sanitation Devices.

⁽⁴⁾ Adverse Condition Allocations apply to areas affected by Point Sources. Adverse Condition or Random Sampling Allocations apply to areas affected by Nonpoint Sources. Adverse condition is defined as "... a State or situation caused by meteorological, hydrological or seasonal events or point source discharges that has historically resulted in elevated [bacteria] levels in the particular growing area." USFDA 2005

⁽⁵⁾ Unless otherwise required by statute or regulation, compliance with this TMDL will be based on ambient concentrations and not end-of-pipe bacteria concentrations

⁽⁶⁾ Replace numeric value with "natural levels" if only source is naturally occurring wildlife. Natural is defined as the biological, chemical and physical conditions and communities that occur within the environment which are unaffected or minimally affected by human influences (CT DEEP 2011a). Sections 2.2.2 and 6.2.7 of this Core Document deal with BMPs and delineating type of wildlife inputs.

cities should identify areas along the developed sections of the impaired segments to install BMPs designed to encourage stormwater to infiltrate the ground before entering the waterbodies. These BMPs would disconnect impervious areas and reduce pollutant loads to the estuary. More detailed information and BMP recommendations can be found in the core TMDL document.

4) Implement a program to evaluate the sanitary sewer system.

Most of New Haven and West Haven near the estuary rely on a municipal sewer system (Figure 4). The Town of West Haven is already conducting wet-weather sampling at six outfall locations, screening for illicit discharges, and mapping their storm sewer system. It is important for New Haven and West Haven to continue to develop programs that evaluate the sanitary sewer system and reduce leaks and overflows. This program should include periodic inspections of the sewer line.

5) Develop a system to monitor septic systems.

Some residents near the New Haven Estuary, particularly along the east side of New Haven Harbor, rely on septic systems. If not already in place, New Haven and West Haven should establish a program to ensure that existing septic systems are properly operated and maintained. For instance, communities can create an inventory of existing septic systems through mandatory inspections. Inspections help encourage proper maintenance and identify failed and sub-standard systems. Policies that govern the eventual replacement of the sub-standard systems within a reasonable timeframe could be adopted. Municipalities can also develop programs to assist citizens with the replacement and repair of older and failing systems.

6) Evaluate municipal education and outreach programs regarding animal waste.

Any education and outreach program should highlight the importance of not feeding waterfowl and wildlife and managing waste from horses, dogs, and other pets. Municipalities and residents can take measures to minimize waterfowl-related impacts by allowing tall, coarse vegetation to grow in riparian areas of impaired segments frequented by waterfowl. Waterfowl, especially grazers like geese, prefer easy access to water. Maintaining an uncut vegetated buffer along the shore will make the habitat less desirable to geese and encourage migration. In addition, any educational program should emphasize that feeding waterfowl, such as ducks, geese, and swans, may contribute to water quality impairments in the New Haven Estuary and can harm human health and the environment. Animal wastes should be disposed of away from any waterbody or storm drain system. BMPs effective at reducing the impact of animal waste on water quality include installing signage, providing pet waste receptacles in high-use areas, enacting ordinances requiring the clean-up of pet waste, and targeting educational and outreach programs in problem areas.

7) Improve education and outreach programs regarding boats and marinas.

Marinas must comply with permit requirements that limit bacteria contribution to the New Haven Estuary. Other programs, such as Connecticut's Clean Marina Program, may also be adopted by all marinas in the estuary to reduce bacteria contribution from non-point source pollution from marinas (http://www.ct.gov/dep/cwp/view.asp?a=2705&q=323530&depNav_GID=1635). The Clean Marina Program is a voluntary program that encourages inland and coastal marina operators to minimize pollution, and recognizes Connecticut marinas, boatyards, and yacht clubs that go above and beyond regulatory compliance as "Certified Clean Marinas." All certified marinas receive a weatherproof Clean Marina Flag to fly at their facility and authorization to use the Clean Marina Program logo on company publications. CT DEEP recognizes certified Clean Marinas through press releases, on its web page, and at public events. As a companion to the Clean Marina Program, the Clean Boater Program encourages boaters to use clean boating techniques when operating and maintaining their boats.

BACTERIA DATA AND PERCENT REDUCTIONS TO MEET THE TMDL

Table 13: Segment 1: LIS CB Inner - New Haven Harbor Bacteria Data

Waterbody ID: CT-C1_013-SB

Characteristics: Saltwater, Class SB, Commercial Shellfishing Harvesting, Recreation, Habitat for Marine Fish and other Aquatic Life and Wildlife, Industrial Water Supply, and Navigation

Impairment: Shellfish Harvesting (fecal coliform)

Water Quality Criteria for fecal coliform:

Geometric Mean: 88 colonies/100 mL 90% of samples less than: 260 colonies/100 mL

Percent Reduction to meet TMDL:

Geometric Mean: NA
90% of samples less than: 10%

Data: 2000 - 2005, 2007 - 2011 from CT DEEP targeted sampling efforts, 2012 TMDL Cycle

Single sample fecal coliform data (colonies/100 mL) from all monitoring stations on Segment 1: LIS CB Inner – New Haven Harbor (CT-C1_013-SB) with annual geometric means and reduction goals for samples

Station Name	Station Location	Date	Result	Wet/Dry	Geo Mean	Reduction of Exceeding Samples
093-04.1	N"4" NEAR City Pt.	1/6/2000	50	wet		
093-04.1	N"4" NEAR City Pt.	6/13/2000	51	wet		
093-04.1	N"4" NEAR City Pt.	7/18/2000	258	wet	59	NA
093-04.1	N"4" NEAR City Pt.	8/4/2000	51	dry		
093-04.1	N"4" NEAR City Pt.	8/16/2000	22	wet		
093-04.1	N"4" NEAR City Pt.	4/3/2001	6	wet		
093-04.1	N"4" NEAR City Pt.	6/19/2001	51	wet		
093-04.1	N"4" NEAR City Pt.	8/13/2001	51	wet	25	NA
093-04.1	N"4" NEAR City Pt.	9/18/2001	14	dry		
093-04.1	N"4" NEAR City Pt.	10/2/2001	51	wet		
093-04.1	N"4" NEAR City Pt.	5/6/2002	4	dry		
093-04.1	N"4" NEAR City Pt.	5/16/2002	51	wet		
093-04.1	N"4" NEAR City Pt.	10/15/2002	50	wet	28	NA
093-04.1	N"4" NEAR City Pt.	10/29/2002	36	dry		
093-04.1	N"4" NEAR City Pt.	11/13/2002	51	wet		

Single sample fecal coliform data (colonies/100 mL) from all monitoring stations on Segment 1: LIS CB Inner – New Haven Harbor (CT-C1_013-SB) with annual geometric means and reduction goals

for samples						Reduction of	
Station Name	Station Location	Date	Result	Wet/Dry	Geo Mean	Exceeding Samples	
093-04.1	N"4" NEAR City Pt.	4/14/2003	28	wet			
093-04.1	N"4" NEAR City Pt.	4/28/2003	28	wet	34	NA	
093-04.1	N"4" NEAR City Pt.	8/6/2003	51	wet			
093-04.1	N"4" NEAR City Pt.	4/26/2004	18	wet			
093-04.1	N"4" NEAR City Pt.	8/18/2004	51	wet	22	NA	
093-04.1	N"4" NEAR City Pt.	8/25/2004	11	dry			
093-04.1	N"4" NEAR City Pt.	5/31/2005	2	wet	NA	NA	
093-04.1	N"4" NEAR City Pt.	6/6/2007	81	wet			
093-04.1	N"4" NEAR City Pt.	9/12/2007	81	wet	50	NA	
093-04.1	N"4" NEAR City Pt.	10/24/2007	19	dry			
093-04.1	N"4" NEAR City Pt.	3/12/2008	54	dry			
093-04.1	N"4" NEAR City Pt.	4/9/2008	18	dry	52	NYA	
093-04.1	N"4" NEAR City Pt.	6/5/2008	68	wet	52	NA	
093-04.1	N"4" NEAR City Pt.	7/28/2008	110	dry			
093-04.1	N"4" NEAR City Pt.	4/1/2009	1	dry			
093-04.1	N"4" NEAR City Pt.	6/10/2009	81	wet			
093-04.1	N"4" NEAR City Pt.	7/23/2009	560	wet	21	10	
093-04.1	N"4" NEAR City Pt.	7/27/2009	44	dry			
093-04.1	N"4" NEAR City Pt.	9/1/2009	2	dry			
093-04.1	N"4" NEAR City Pt.	3/25/2010	74	wet			
093-04.1	N"4" NEAR City Pt.	4/26/2010	42	wet			
093-04.1	N"4" NEAR City Pt.	5/19/2010	70	wet	57	NA	
093-04.1	N"4" NEAR City Pt.	7/21/2010	28	wet			
093-04.1	N"4" NEAR City Pt.	8/25/2010	96	wet			
093-04.1	N"4" NEAR City Pt.	3/15/2011	24	dry			
093-04.1	N"4" NEAR City Pt.	4/25/2011	2	wet	20	NA	
093-04.1	N"4" NEAR City Pt.	6/13/2011	171	wet			
093-05.0	S. "Q." Bridge	1/6/2000	22	wet			
093-05.0	S. "Q." Bridge	7/18/2000	139	wet	53	NA	
093-05.0	S. "Q." Bridge	8/4/2000	51	dry	33	INA	
093-05.0	S. "Q." Bridge	8/16/2000	51	wet			

Single sample fecal coliform data (colonies/100 mL) from all monitoring stations on Segment 1: LIS CB Inner – New Haven Harbor (CT-C1_013-SB) with annual geometric means and reduction goals

for samples

for samples						Reduction of	
Station Name	Station Location	Date	Result	Wet/Dry	Geo Mean	Exceeding Samples	
093-05.0	S. "Q." Bridge	4/3/2001	51	wet			
093-05.0	S. "Q." Bridge	6/19/2001	51	wet			
093-05.0	S. "Q." Bridge	8/13/2001	51	wet	37	NA	
093-05.0	S. "Q." Bridge	9/18/2001	11	dry			
093-05.0	S. "Q." Bridge	10/2/2001	50	wet			
093-05.0	S. "Q." Bridge	5/6/2002	8	dry			
093-05.0	S. "Q." Bridge	5/16/2002	51	wet			
093-05.0	S. "Q." Bridge	10/15/2002	51	wet	35	NA	
093-05.0	S. "Q." Bridge	10/29/2002	51	dry			
093-05.0	S. "Q." Bridge	11/13/2002	51	wet			
093-05.0	S. "Q." Bridge	4/14/2003	8	wet			
093-05.0	S. "Q." Bridge	4/28/2003	18	wet	20	NA	
093-05.0	S. "Q." Bridge	8/6/2003	51	wet			
093-05.0	S. "Q." Bridge	4/26/2004	51	wet			
093-05.0	S. "Q." Bridge	8/18/2004	28	dry	42	NA	
093-05.0	S. "Q." Bridge	8/25/2004	51	dry			
093-05.0	S. "Q." Bridge	5/31/2005	2	wet	NA	NA	
093-05.0	S. "Q." Bridge	6/6/2007	81	wet			
093-05.0	S. "Q." Bridge	9/12/2007	81	wet	50	NA	
093-05.0	S. "Q." Bridge	10/24/2007	19	dry			
093-05.0	S. "Q." Bridge	3/12/2008	81	dry			
093-05.0	S. "Q." Bridge	4/9/2008	62	dry			
093-05.0	S. "Q." Bridge	5/14/2008	9	dry	62	NA	
093-05.0	S. "Q." Bridge	6/5/2008	81	wet			
093-05.0	S. "Q." Bridge	7/28/2008	250	dry			
093-05.0	S. "Q." Bridge	4/1/2009	1	dry			
093-05.0	S. "Q." Bridge	6/10/2009	81	wet			
093-05.0	S. "Q." Bridge	7/23/2009	81	wet	29	NA	
093-05.0	S. "Q." Bridge	7/27/2009	210	dry			
093-05.0	S. "Q." Bridge	9/1/2009	16	dry			

Single sample fecal coliform data (colonies/100 mL) from all monitoring stations on Segment 1: LIS CB Inner – New Haven Harbor (CT-C1_013-SB) with annual geometric means and reduction goals for samples

Station Name	Station Location	Date	Result	Wet/Dry	Geo Mean	Reduction of Exceeding Samples
093-05.0	S. "Q." Bridge	3/25/2010	260	wet		
093-05.0	S. "Q." Bridge	4/26/2010	12	wet		
093-05.0	S. "Q." Bridge	5/19/2010	200	wet	85* (NA)	10
093-05.0	S. "Q." Bridge	7/21/2010	35	wet		
093-05.0	S. "Q." Bridge	8/25/2010	200	wet		
093-05.0	S. "Q." Bridge	3/15/2011	81	dry		
093-05.0	S. "Q." Bridge	4/25/2011	1	wet	24	NA
093-05.0	S. "Q." Bridge	6/13/2011	171	wet		

Shaded cells indicate an exceedance of water quality criteria

Wet and dry weather geometric mean values for all monitoring stations on Segment 1: LIS CB Inner – New Haven Harbor (CT-C1_013-SB)

Station Name	Station Location	Vacus Compled	Number of	Geometric Mean					
		Years Sampled	Wet	Dry	All	Wet	Dry		
093-04.1	N"4" NEAR City Pt.	2000-2005, 2007-2011	29	13	32	44	16		
093-05.0	S. "Q." Bridge	2000-2005, 2007-2011	27	15	39	44	31		
Shaded cells indicate an exceedance of water quality criteria									

[†]Average of two duplicate samples

^{**} Weather conditions for selected data taken from Hartford because local station had missing data

^{*}Indicates geometric mean and 90% less than values used to calculate the percent reduction

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